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#### Introduction

#### **Overview**

#### Introduction

Agencies and institutions recover indirect cost from grants and contracts by completing a cost allocation plan and/or an indirect cost rate proposal. This topic assists agencies and institutions in meeting the Commonwealth's indirect cost recovery requirements as set forth in the *Appropriation Act*, Section 4-2.03.a.

This topic is organized into two parts as follows:

#### **Indirect Cost Recovery from Grants and Contracts**

 Establishes the policies and procedures for agencies to follow in recovering indirect cost recovery from grants and contracts. The role of Department of Accounts (DOA), central service agencies, and agencies/institutions is outlined.

#### Nongeneral, Nonfederal Funded Agencies

• Explains the rationale of full costing statewide indirect cost recovery and the role of DOA and Department of Planning and Budget (DPB) in both the preparation of the full costing assessment schedule and the resulting Appropriation Act transfers.

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#### **Definitions**

#### Agency Versus Statewide Indirect Costs

The following table compares the differences between Agency and Statewide Indirect Costs.

Agency Indirect Costs	Statewide Indirect Costs
are incurred by agencies.	are incurred by central service
	agencies.
have administrative costs borne	are calculated in Federal SICAP.
by the agency.	
benefit more than one cost	are provided to agencies by DOA.
objective.	

#### Allocation Plans

The <u>Full-Costing</u> Statewide Indirect Cost Allocation Plan is compared to the <u>Federal</u> Statewide Indirect Cost Allocation Plan as follows:

Plan Type	Preparation	Allocation	Governed	Support	Product
<b>Full Costing</b>	DOA	General Fund	NOT governed	Determines	Assessment
		cost of central	by Federal	support to	Schedule (Appro-
		service agencies	guidelines	nongeneral,	priation Act
				nonfederal	transfers section)
				programs	
Federal	DOA	General Funds	By Federal	Determines	Fixed costs by
		costs of central	guidelines	support to	agency or State-
		service agencies	(OMB A-87)	Federal	wide indirect costs
				programs	to be used in
					agency rate
					calculations

#### Central Service Agency

A state agency rendering various support services to other state agencies in the Commonwealth. These services may or may not be provided without charge to the recipient agency.

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#### **Definitions, Continued**

#### Central Service Cost Allocation Plan

Cost allocation plan prepared by DOA and referred to as the *Statewide Indirect Cost Allocation Plan*, (SICAP) that documents, identifies, accumulates, and allocates allowable costs of services provided by central service agencies to benefiting agencies and institutions.

#### Cognizant Agency

Federal agency responsible for reviewing, negotiating, and approving a specific state agency or institution's cost allocation plan or indirect cost rate proposal.

<u>Example</u>: The Department of Health and Human Services is the cognizant agency for all state central service cost allocation plans.

The federal Office of Management and Budget (OMB) publishes a list of all cognizant agencies which can be obtained by contacting:

Office of Federal Financial Management Financial Standards and Reporting Branch Office of Management and Budget Washington, DC 20503 Telephone 202-395-3993.

#### **Direct Versus Indirect Costs**

#### **Direct Costs**

Expenditures identified to a final (or singular) cost objective.

#### **Indirect Costs**

- Expenditures incurred for a joint purpose that benefit more than one cost objective.
- Expenditures are divided between Agency and Statewide.

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#### **Definitions, Continued**

#### **Indirect Cost Recoveries**

Funds received for indirect costs that are reimbursed or "recovered" from grants. Indirect cost recoveries are identified as either agency or statewide.

#### OMB Circular 87

#### Cost Principles for State and Local Governments

- Published by Federal Office of Management and Budget.
- Establishes the principles and standards for determining costs for Federal awards carried out through grants, cost reimbursement contracts, and other agreements with State and local governments and federallyrecognized Indian tribal governments (governmental units).

#### OMB Circular 21

#### Cost Principles for Educational Institutions

- Published by Federal Office of Management and Budget.
- Establishes the principles for determining costs applicable to grants, contracts, and other agreements with educational institutions.

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#### **Indirect Cost Recovery From Grants and Contracts**

#### **Policy**

#### **Policy**

These policies apply to all State agencies and institutions planning to accept or currently administering a grant or contract.

The *Appropriation Act*, Section 4-2.03.a., Indirect Cost, states:

Each state agency, including institutions of higher education, which accepts a grant or contract, shall recover full statewide and agency indirect costs unless (a) exempted from this provision by the State Comptroller or (b) prohibited by the grantor agency.

#### Responsibility

#### Introduction

Responsibility and/or functions performed by

- DOA.
- Central Service Agencies, and
- Agencies & Institutions Administering Grants or Contracts

are as follows:

#### **DOA**

The State Comptroller is authorized in the *Appropriation Act* to issue regulations to carry out the provisions related to indirect cost recovery, including the establishment of criteria to certify that agencies are in compliance with these provisions.

In support of indirect cost recovery, the **Department of Accounts** (DOA) will perform the following functions:

- 1. Maintain a technical understanding of indirect cost allocation plans and indirect cost rate proposals.
- 2. Prepare and negotiate the federal Statewide Indirect Cost Allocation Plan (SICAP) with the federal Department of Health and Human Services (DHHS).

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#### Responsibility, Continued

- 3. Notify agencies and institutions of their allocation of costs in the federal SICAP once approved by DHHS.
- 4. Review and monitor indirect cost recoveries recorded in CARS to ensure accurate and timely reporting of indirect cost recoveries.
- 5. Prepare year end adjusting entries to remove the duplicate recording of revenue for purposes of financial statement preparation (agency only).
- 6. Provide agency assistance in the development and negotiation of indirect cost allocation plans and indirect cost rate proposals.
- 7. Notify central service agencies of any changes to required statistics at least six months prior to the end of the fiscal year for which the statistics are needed, if possible.

#### Central Service Agencies

All **central service agencies** or other agencies submitting data for inclusion in the statewide indirect cost allocation plan will perform the following functions:

- 1. Provide the required data to DOA in a timely manner, accompanied by the standard SICAP certification form signed by the agency head or his or her designee attesting to the integrity of the data;
- 2. Maintain work papers supporting the data provided to DOA for a period of three years commencing with the submission of said data to DOA; and
- 3. Make available all related work papers upon request to DOA, Auditor of Public Accounts or federal reviewers.

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#### Responsibility, Continued

#### Agencies & Institutions Administering Grants or Contracts

#### **State agencies and institutions** will perform the following functions:

- 1. Prepare indirect cost allocation plans or indirect cost rate proposals in accordance with federal cost principles.
- 2. Maintain working papers supporting the development of timely indirect cost rate proposals or cost allocation plans, and make these working papers available to the Auditor of Public Accounts and DOA's staff for review upon request.
- 3. Record indirect cost recoveries and all related transfer entries if appropriate (<u>agencies only</u>), at least on a quarterly basis, to the appropriate fund and revenue source code according to accounting procedures established by DOA (See *Recording Indirect Cost Recoveries in CARS* below).
- 4. Ensure that adequate information is available to monitor indirect cost recovery efforts.
- 5. Complete the Indirect Cost Recovery Reconciliation Attachments included with the Fiscal Year Closing Procedures (agencies only).
- 6. Maintain and make available for review upon request a listing of all grants and contracts.

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#### **Procedures**

Indirect Cost Rate Proposal or Cost Allocation Plan Agencies or institutions planning to accept or currently administering a federally funded grant or contract—including those agencies and institutions supported entirely from nongeneral fund appropriations— must prepare and submit to its federal cognizant agency an indirect cost rate proposal or cost allocation plan in accordance with federal requirements. This is done either annually or as required by the cognizant agency.

According to the federal Office of Management and Budget (OMB), if sub-recipients of federal grants do not have a federal cognizant agency, State grantor agencies are responsible for reviewing and approving rates used to reimburse sub-recipients' indirect costs.

The proposed indirect cost rate established in the indirect cost rate proposal or the amounts included based on a cost allocation plan must include full statewide and agency indirect costs as allowed by federal cost principles (OMB A-87 or A-21).

Agencies and institutions must apply the indirect cost rate, which is negotiated between the State agency and its federal cognizant agency, to all grants and contracts unless prohibited by the grantor or exempted by DOA. (See *Exemptions* below.)

Central Service Agencies & Internal Service Funds The costs associated with central service agencies may be charged to federal grants as either a direct or indirect cost. If a central service cost is direct billed to a benefiting agency, the same or like costs cannot be allocated indirectly in the SICAP.

The federal SICAP allocates allowable indirect central service costs according to *OMB Circular A-87*. Unallowable costs identified in *OMB Circular A-87* are not to be allocated in the federal SICAP or included in the calculation of direct billing rates.

Effective with the 1999 SICAP, which is based on costs incurred for fiscal year 1997, the SICAP will include all central service costs claimed either as billed or allocated costs under federal awards with the required documentation as stated below. Costs of central services omitted from the plan will not be reimbursed.

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#### Procedures, Continued

Central Service Agencies' Required Documentation Effective with the fiscal year ending June 30, 1997, central agencies are required by federal *OMB Circular A-87*, revised 5/95, to submit to DOA for inclusion in the federal SICAP the following detailed documentation:

<b>Internal Service Funds</b>	1. Description of the service
(budget of \$5 million or	2. Fund balance sheet
more)	3. Revenue/expenditures statement, with revenues by source
	4. List of nonoperating transfers
	5. Description of billing procedures (methodology) used to charge costs
	to users
	6. Schedule of current rates
	7. Schedule comparing full revenues (including imputed revenues) by
	service to the allowable costs
	8. Explanation of how variances between revenue and expenses will be
	handled
	9. Documentation that revenue reported includes all revenues generated
	by the service including unbilled and uncollected revenue
	10. Expenses reported by cost category
	11. Amount of working capital reserve if any
<b>Self Insurance Funds</b>	1. Fund balance sheet
	2. Statement showing fund income and fund outlays, including a
	summary of billings and claims paid by agency
	3. Listing of all non-operating transfers into and out of the fund
	4. The types of risks covered by the fund
	5. An explanation of how the level of fund contributions are
	determined, and actuarial report
	6. Description of procedures used to charge or allocate fund
	contributions to benefiting activities
	7. Explanation of reserve levels in excess of claims paid, submitted
	but not adjudicated, and incurred but not submitted
Fringe Benefits	1. Listing of fringe benefits provided
	2. Overall annual cost of each benefit
	3. Current fringe benefit policies
	4. Procedures used to charge or allocate the costs to benefiting activities
	1. Trocodices about to charge of another the costs to benefitting activities

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#### Procedures, Continued

#### **Central Service Agencies' Required Documentation** (continued)

Pension and Post-	1. Funding policies	
<b>Retirement Health</b>	2. Pension plan's costs accrued for a year	
<b>Benefit Costs</b>	3. Amount funded, and dates of funding	
	4. Copy of actuarial report	
	5. Plan trustee's report	
	5. Schedule showing the value of the interest cost associated with any	
	late funding	
Other Billed Central	The same documentation as required for Internal Service Funds is to be	
Service Activity Not	completed and maintained. But, it is not required to be submitted to DOA	
<b>Identified Above</b>	unless specifically requested to do so by DOA, APA or federal reviewers.	

#### Over/Under Recoveries of Internal Service Funds

Adjustments are required to be made for the over/under recoveries of Internal Service Funds. These adjustments can be made through the yearly federal SICAP in those instances where the over/under recovery does not exceed \$500,000.

Amounts that are <u>not</u> adjusted through the annual SICAP will be adjusted in the following manner subject to federal approval:

- cash repayment to the federal government
- credits to the amounts charged to the individual programs, or
- credit adjustment to future billing rates

#### DOA will notify central service agencies of the following:

- a) any over/under recoveries that are not adjusted through the SICAP
- b) any cost allocated to these internal service fund cost pools in the SICAP (cross allocations) that are not allocated to benefiting agencies. These costs allocated to the internal service funds in the SICAP are internal service fund costs and may be included in the calculation of the amount of over/under recovery.

Central Service agencies that manage internal service funds where an adjustment is necessary, will notify DOA as to the method and timeframe of repayment. DOA will coordinate any required adjustment with DHHS.

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#### Recording Indirect Cost Recoveries in CARS: Agencies Only

#### Overview

All indirect cost recoveries from federal grants and contracts received by agencies are subject to the following procedures shown in the following document, PROCEDURES FOR RECORDING STATEWIDE INDIRECT COST RECOVERIES.

#### Statewide Indirect Cost Recoveries

The following procedure applies to Statewide Indirect Cost Recoveries.

Step	Action
1	Deposit Indirect Cost Drawdown in CARS.
2	Prepare a Deposit Certificate (DC) or Deposit ticket (DT) to
	deposit the drawdown.
3	Record the drawdown in the federal fund 1000 using transaction code (TC) 001 (Debit cash/Credit revenue), batch type 7, and revenue soruce code 09071.
4	Transfer immediately the drawdown to either the general fund 0100 or special fund 0280 using the criteria and procedures as follows:

#### IF THE STATEWIDE INDIRECT COST IS NOT APPROPRIATED TO THE AGENCY ...

Step	Action
1	Prepare an Agency Transaction Voucher.
2	Use (ATV) TC 380 (Debit expenditures/Credit cash) to record expenditures in the federal fund 1000 with subobject code 1481 (Statewide Indirect Recoveries) and the applicable program/subprogram(s).
3	Use TC 136 (Debit cash/Credit revenue) to record the revenue in the general fund 0100 with revenue source code 09071.
4	Use BATCH TYPE 6 to process in CARS.

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#### Recording Indirect Cost Recoveries in CARS: Agencies Only, Continued

#### IF THE STATEWIDE INDIRECT COST IS APPROPRIATED TO THE AGENCY (As Approved in the Appropriation Act) ...

Step	Action
1	Prepare an Agency Transaction Voucher.
2	Use (ATV).TC 380 (Debit expenditures/Credit cash) to record expenditures in the federal fund 1000 with subobject code 1481 (Statewide Indirect Recoveries) and the applicable program/subprogram(s).
3	Use TC 136 (Debit cash/Credit revenue) to record the revenue in the special fund 0280 with revenue source code 09071.
4	Use BATCH TYPE 6 to process in CARS.

### **Cost Recoveries**

**Agency Indirect** The following procedure applies to Agency Indirect Cost Recoveries

Step	Action
1	Prepare a DC or DT to deposit the drawdown.
2	Record the drawdown in the federal fund 1000 using TC 001
	(Debit cash/Credit revenue), batch type 7, and revenue source code 09070.
3	Prepare immediately an ATV to transfer the drawdown to special fund 0280.
4	Use TC 380 (Debit expenditures/Credit cash), to record expenditures in the federal fund 1000 with subobject code 1482 (Agency Indirect Cost Recoveries)* and the applicable program/subprogram(s).
5	Use TC 136 (Debit cash/Credit revenue) to record the revenue in special fund 0280 with revenue source code 09070.
6	Batch ATV transactions as a batch type 6.

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# Procedures for Recording Statewide Indirect Cost Recoveries

# Statewide Unappropriated

Action by Agency	Doc	Trans Batch Code Type	Batch Type	General Fund 0100	Special Fund 0280	Federal Fund 1000
DRAWDOWN (Based on cost allocation plan or rate)	DC	001	7			Debit cash-GLA 101 Credit revenue-GLA 961 (Rev. Source Code 09071)
REPORTING TO GRANT	ATV	380	9			Debit expenditures-GLA 901 * (Subobject code 1481) Credit cash-GLA 101
	ATV	136	9	Debit cash-GLA 101 Credit revenue –GLA 961 (Rev. Source Code 09071)	11	

# Statewide Appropriated

1 2	Action by Agency  DRAWDOWN (Based on cost allocation plan or rate)  REPORTING TO GRANT	Doc DT ATV	Trans Code 001	Batch Type	General Fund 0100	Special Fund 0280	Federal Fund 1000 Debit cash-GLA 101 Credit revenue-GLA 961 (Rev. Source Code 09071) Debit expenditures-GLA 901 ** (Subobject code 1481)
		ATV	136	9		Debit cash-GLA 101 Credit revenue –GLA 961 (Rev. Source Code 00071)	
3	APPROPRIATION Submit Form 27 to DPB budget analyst for appropriation of amount of revenue recorded in find 0280	Form 27	034	∞		Debit Surplus Approp. GLA 901 Credit Approp. – GLA 900	
4	4 RECORD ACTUAL EXPENDITURES When appropriation is received from DPB, code and record expenditures as "regular," subobject codes, e.g., salaries, services, etc., is fund 0280					Debit expenditures – GLA 901 Credit cash – GLA 101	

\* To make this entry you must have received an appropriation from DPB in fund 1000.

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Procedures for Recording Agency Indirect Cost Recoveries

Action by Agency Doc Trans Batch General Special Fund Code Type Fund 0280	DRAWDOWN (Based on cost allocation plan or rate)  DC 001 7  DT DT	REPORTING TO GRANT ATV 380 6	ATV 136 6 Debit cash-GLA 101  Credit revenue—GLA 961  (Rev. Source Code 09070)	APPROPRIATION Submit Form 27 to DPB budget analyst for appropriation of amount of revenue recorded in fund 0280.	RECORD ACTUAL EXPENDITURES  When appropriation is received from DPB, code and record expenditures as "regular," subobject, codes, e.g., "regular," subobject, codes, e.g.,
Federal Fund 1000	Debit cash-GLA 101 Credit revenue-GLA 961 (Rev. Source Code 09070)	Debit expenditures-GLA 901* (Subobject code 1482) Credit cash-GLA 101		10	

\* To make this entry you must have received an appropriation from DPB in fund 1000.

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# Recording Indirect Cost Recoveries in CARS: Agencies Only, Continued

#### **Accountability**

These procedures provide complete accountability for indirect cost recovery and the basis for documenting the indirect cost expense in the federal fund—resulting in indirect cost recovery revenue being double recorded in CARS.

Agencies must recognize this and ensure the total of indirect cost recovery revenue in both the **general fund 0100** and **special fund 0280** (revenue source code 09071 and 09070, respectively) is equal to the indirect cost recovery revenue recorded in the **federal fund 1000**. Any difference should represent revenue in the federal fund pending transfer. DOA will eliminate this duplication for financial reporting purposes.

#### **Appropriation**

Appropriations to support the expenditures in both the **federal fund 1000** and **special fund 0280** must be obtained from the Department of Planning and Budget (DPB) by submitting a Form 27. When the appropriation is received for the special fund, actual expenditures should be recorded in the "regular" subobject codes (e.g., salaries, services, etc.) in **fund 0280**.

<u>Questions</u> regarding the procedures for obtaining the proper *appropriation* for indirect cost should be addressed by each agency to its DPB budget analyst.

To enhance accounting control of these transactions, the recoveries can be recorded by grant or program by using the cost code or project code structure available in CARS.

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# Recording Indirect Cost Recoveries in CARS: Institutions of Higher Education

#### **Appropriation**

According to the *Appropriation Act*, Section 4-2.03c, indirect cost recoveries for all institutions of higher education shall be appropriated according to the following provisions:

- a. Seventy percent shall be retained by the institutions as an appropriation of funds by the General Assembly for the conduct and enhancement of research and research-related requirements. This portion of the indirect cost recoveries shall be recorded in **fund/fund detail 0303**, **Program 110**.
- b. Thirty percent shall be transferred to the education and general revenues of the institutions. This portion of the indirect cost recoveries shall be recorded in **fund/fund detail 0300**, **Program 100**.
- c. Institutions of higher education may retain 100 percent of the indirect cost recoveries related to research grants and contract levels in excess of levels authorized in Part 1 of the *Appropriation Act*. This provision is included as an additional incentive for increasing externally funded research activities. This portion of the indirect cost recoveries shall be recorded in **fund/fund detail 0316, Program 110**. <u>Please consult future Appropriation Acts for continuation of this provision</u>.

## Recording Revenue

All indirect cost recoveries received by institutions of higher education must be recorded in the following manner:

All **statewide** indirect cost recoveries must be recorded into the Higher Education Operating Fund using revenue source code 09071. If an institution cannot record statewide indirect cost recoveries separately from institution indirect cost recoveries as the funds are received, an adjustment must be made each quarter in order to properly reflect the statewide portion of the indirect cost recovery.

All **higher education institution** indirect cost recoveries must be recorded into the Higher Education Operating Fund using revenue source code 09073, *Recovery of Higher Education Institution Indirect Cost of Grant/Contract Administration*.

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# Recording Indirect Cost Recoveries in CARS: Institutions of Higher Education, Continued

# Recording Revenue

The recording of statewide and institution recoveries into the Higher Education Operating Fund is for information purposes only and is not intended to conflict with the provisions of the Appropriation Act regarding the use of the funds by higher education institutions.

**Note**: Effective July 1, 1991, a unique revenue source code, 09074, *Administrative Allocation for Student Scholarships and Loans* was established to record the deposit of overhead and **administrative allowances** received from loan, scholarship, and work programs such as PELL, SEOG, and federal work study. This revenue source code is used only to record administrative allowances received from various financial aid programs.

#### **General Exemption**

#### Hardship

If an agency or institution believes that adherence to these procedures would create an undue hardship because of extraordinary circumstances or conditions—such as the cost to develop an agency indirect cost proposal exceeds anticipated recoveries—the agency head may request the State Comptroller to amend or modify the requirements.

#### Written Request

The written request shall include an explanation of the circumstances or conditions and the exact nature of the proposed modification. In turn, the State Comptroller shall provide written notification of any approved request or in the event approval cannot be accommodated, the reasons why.

# **Exemption Timeframe**

All exemptions or modifications to the indirect cost requirements approved by DOA will be granted only for a one-year timeframe, since an agency's/institution's situation could change significantly from year to year. Agencies/institutions will be required to submit written requests annually as needed. This will allow for DOA to properly review compliance with the provisions of indirect cost recovery as outlined in the *Appropriation Act*.

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# SPECIFIC INSTRUCTIONS: INSTITUTIONS OF HIGHER EDUCATION ONLY

#### Waiver

The requirement to apply a negotiated indirect cost rate to a specific grant or contract may be waived or the rate limited by the President of the institution or his designee if the grant or contract is judged to be of exceptional academic merit. Or, the inclusion of indirect cost recoveries would result in the potential grantee's proposal not being cost competitive. All exemptions or rate reductions should be reviewed and approved annually by the President of the institution or his designee.

#### **Internal Control**

#### Internal Control

Agencies and institutions that accept grants and contracts should implement internal control procedures to assure the following:

- Unallowable costs have not been charged to federal awards either directly or indirectly.
- The agency organizational structure has been reviewed to determine the appropriate proposal methodology.
- An indirect cost rate proposal or cost allocation plan has been prepared according to requirements set forth in *OMB Circular A-87, Cost Principles for State and Local Governments*, or *OMB Circular A-21, Cost Principles for Educational Institutions*.
- The completed indirect cost rate proposal or cost allocation plan has been submitted, negotiated and approved by the cognizant agency in a timely manner.

The approved indirect cost rate or amount has been applied against grant awards.

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#### Internal Control, Continued

- The indirect cost recoveries and transfer entries have been recorded in the Commonwealth's Accounting and Reporting System (CARS) correctly and in a timely manner.
- The work papers to support the development and application of indirect cost proposals and/or cost allocation plans and the recovery of indirect costs have been retained.
- Documentation is maintained concerning the restriction or prohibition of indirect cost recovery from grants and contracts.

#### **Records Retention**

#### Records Retention

- Maintain indirect cost rate proposals or cost allocation plans, financial records, and support for three years beginning at the close of the fiscal year covered by the rate/plan.
- If undergoing audits, claims or litigation retain documentation until completion.
- Destruction of records should occur in accordance with policies and procedures from the Library of VA.
- References for recordkeeping requirements can be found in:
  - OMB Circular A-102, Uniform Administrative Requirements for Grants-in-Aid to State and Local Governments
  - OMB Circular A-110, Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations.

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#### **DOA Contact**

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#### **Subject Cross References**

**Subject Cross** CAPP Topic No. 20205, *Deposits* **References** Appropriation Act Section 4-2.03

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# Indirect Cost Recovery From Nongeneral, Nonfederal Funded Agencies

#### **Policy**

#### **Policy**

The policies set forth below on indirect cost recovery apply to all state agencies and institutions (except institutions of higher education) funded in whole or in part by nongeneral, nonfederal funds, including user fees charged to the general public, but not to other state agencies.

#### Responsibility

#### Introduction

Responsibility and/or functions performed by

- DOA,
- DPB,
- Central Service Agencies, and
- Agencies and Institutions (except Higher Education)

are as follows:

#### **DOA**

- In support of indirect cost recovery, DOA will provide the following functions:
- Maintain a technical understanding of full-costing methods.
- Prepare the full costing indirect cost allocation plan (SICAP).
- Notify central service agencies of any changes to required statistics at least six months prior to the end of the fiscal year for which the statistics are needed, if possible.
- Send copies of the Full Costing Assessment Schedule to the appropriate personnel at the Department of Planning and Budget (DPB), in a timely manner.

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#### Responsibility, Continued

# DOA continued

- Distribute copies of the proposed assessments to agencies after DPB reviews and makes adjustments.
- Provide agencies upon request, an explanation of the methodology used in developing the full-costing SICAP.
- Transfer to the General fund of the State Treasury prior to fiscal year end, the assessed indirect cost recovery amounts included in the Appropriation Act Section Three, that represent the General fund support provided to an agency's nongeneral, nonfederal fund.
- Provide assistance upon written request, to an agency or institution in developing operating budgets and user fees, when applicable, that accurately reflect the full cost of delivering a prescribed service or product.

#### **DPB**

In support of indirect cost recovery, DPB will provide the following functions:

- Review the Full Costing Assessment Schedule prepared by DOA taking into consideration operational, budgetary, or other extenuating circumstances that could affect a agency's ability to pay these indirect costs.
- Notify DOA in writing in a timely manner of any and all exemptions and adjustments to the Assessment Schedule, so that DOA can distribute the Final Assessment Schedule to the affected agencies within established timeframes.
- Determine the final assessment to be included in the *Appropriation Act*.

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#### Responsibility, Continued

#### Central Service Agencies

All central service agencies or other agencies submitting data for inclusion in the full costing indirect cost allocation plan will perform the following functions:

- Provide required data to DOA in a timely manner, accompanied by the standard SICAP certification form signed by the agency head or his or her designee attesting to the integrity of the data.
- Maintain work papers supporting data provided to DOA for a period of three years commencing with the submission of data to DOA.
- Make available all related work papers upon request to DOA and Auditor of Public Accounts.

# **Agencies & Institutions**

Agencies and institutions **except institutions of higher education**, must do the following:

- Develop operating budgets and budget requests based on full costs. Full
  costs must include direct costs, agency indirect costs, and statewide
  indirect costs. The statewide indirect costs to be used must be from the
  most recent full-costing SICAP available at the time of the development
  of the budget.
- When applicable, maintain complete working papers supporting the development of user fees based on full-costing methods.
- Reimburse the General Fund as directed in Section 3-1.01 of the *Appropriation Act*, for central service agency General Fund support associated with nongeneral, nonfederal fund activity.

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#### **Procedures**

#### Full Costing Indirect Cost Allocation Plan

DOA will prepare annually a full-costing Statewide Indirect Cost Allocation Plan (SICAP) that reflects all costs incurred by the General Fund on behalf of state agencies and institutions as recorded in the Commonwealth Accounting and Reporting System (CARS).

The full costing plan differs from the federal SICAP by its inclusion of certain General fund expenditures that are unallowable in the federal plan. Such items include but are not limited to General fund expenditures for Legislative Services, Executive Services, Taxation, and Banking Services.

The full costing SICAP will provide the base amount of statewide indirect costs associated with the nongeneral, nonfederal activity of an agency for the most recently completed fiscal year.

#### Assessment Schedule

The costs allocated in the SICAP computation are transferred to the Assessment Schedule. The Assessment Schedule computes the "Potential General Fund Support" that is provided to an agency's nongeneral, nonfederal funds. The Potential General Fund Support is a fair representation of the General Fund Support received by a particular nongeneral, nonfederal fund within an agency. This potential support does not take into consideration operational, budgetary, or other extenuating circumstances that could affect the agency's ability to pay these indirect costs.

The process to determine the Potential General Fund Support is outlined below:

Stage	Description
1	The Costing Allocations total allocated from the SICAP is
	multiplied by the percent of non-general expenditures to total
	expenditures for each agency/fund. The result is the <b>Prorated</b>
	General Fund Support.
2	The Prorated General Fund Support amounts are adjusted for any
	interest income received in the General fund for the particular
	nongeneral fund cash balances maintained by the agencies during
	the year.
3	The Prorated General Fund Support is adjusted by DPB for any
	unusual or extraordinary items or exemptions.

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#### Procedures, Continued

# Exemptions and Adjustments

The Department of Planning and Budget is responsible for granting all exemptions and adjustments to the Potential General Fund Support on the Assessment Schedule. DOA will make adjustments to the SICAP allocation methodology only if a material error is found. No exemptions or adjustments are granted by DOA.

#### **Agency Request for Adjustment**

Agencies that believe extenuating circumstances exist and are not reflected in their allocation of statewide indirect costs should contact their DPB analyst. The DPB will then evaluate the concern and determine the adjustment, if any, which should be made to the assessment. For example, reimbursement of special revenue fund expenditures by federal funds (e.g., Medicaid payments to mental health facilities) is an extenuating circumstance that may require an adjustment to the statewide indirect cost allocation amounts.

#### **Department of Planning and Budget Evaluation**

Prior to development of the Executive Budget proposal and the recommendations for cost recovery transfers detailed in Section 3-1.01 of the *Appropriation Act*, the DPB evaluates the impact that transferring statewide indirect cost recoveries to the General fund would have on each affected agency. The DPB may determine that the expenditure of program dollars to reimburse the General fund for statewide indirect costs will have a detrimental programmatic affect on an agency. If so, that agency will not be required to reimburse the General fund for statewide indirect costs and the amount recovered will not be shown as a transfer in the *Appropriation Act*.

#### **Transfers**

Agencies that are able to recover statewide indirect costs will remit into the General fund the assessed amount of statewide indirect cost through a cash transfer. The State Comptroller each year as required will effect this by the *Appropriation Act*, Section 3-1.00, "Transfers."

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#### **Records Retention**

# **Records Retention**

Documentation supporting the agency's recovery of statewide indirect costs associated with nongeneral, nonfederal funds, or the prohibition thereof, must be maintained at the agency for a period of at least three years, or until the completion of a review by the Auditor of Public Accounts, whichever is longer. If undergoing audits, claims or litigation retain documentation until completion.

#### **DOA Contact**

**DOA Contact** 

Indirect Cost Coordinator Financial Reporting



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#### **Subject Cross References**

Subject Cross References CAPP Topic No. 20205, Deposits

Appropriation Act Section 3-1.01 and 4-2.03